

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 16-20831

v.

Hon. Victoria A. Roberts

TIMOTHY BARTH,

Defendant

Sara D. Woodward (P73784)
Deputy Chief, General Crimes Unit
United States Attorneys Office
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Detroit, Michigan 48226
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DEFENDANT'S MOTION
TO TRAVEL OUT-OF-STATE

COMES NOW, Defendant Timothy Barth, by and through his attorney of record, David S. Steingold, and for his motion for permission to travel out-of-state, states to this Court as follows:

1. Defendant is currently on bond with this Court facing charges of receipt of child pornography in violation of 18 U.S.C. § 2252(A)(a)(2). He is currently on a tether with home confinement. He is released solely for court-ordered meetings, and for treatment with his doctors.

2. Timothy Barth's mother, Helen McAlerney Barth, date of birth November 3, 1918, is currently at Goshen Hospital in Goshen, Indiana, having been taken there on

an emergency basis this past week. It is likely that she will pass within the next day or two.

3. Defendant Barth is requesting permission to travel to Goshen, Indiana, to either visit with his mother before she passes, or to attend her funeral if that should happen before this Court considers this Motion.

4. Defendant is willing to comply with any conditions necessary to effectuate the visit, including checking in with Pre-Trial Services at the nearest Federal District Court to Goshen, Indiana.

5. The visit will last no longer than necessary, and will end after Defendant Barth's mother's funeral.

WHEREFORE, Defendant respectfully prays this Court grant his Motion to Travel Out of State.

Respectfully submitted,

/s/ David S. Steingold

LAW OFFICES OF DAVID S. STEINGOLD
BY: DAVID S. STEINGOLD (P 29752)
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Dated: February 22, 2017

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MEMORANDUM IN SUPPORT OF
DEFENDANT'S MOTION TO TRAVEL OUT-OF-STATE

Timothy Paul Barth's mother, Helen McAlerney Barth, is 98 years old. She was admitted to the hospital this past week and is expected to pass sometime early this week. Defendant Barth would like permission to visit her at the hospital if that can be done before she passes, and, in either case, to stay for her funeral.

Defendant Barth is on bond to this Court and is in full compliance.

Defendant Barth would be happy to comply with any conditions necessary to allow his travel. He wants to try and visit his mother before she passes but, in any event, would like to stay for her funeral.

For all the reasons set forth herein, Defendant Timothy Paul Barth requests this Honorable Court grant him permission to travel out of state.

Respectfully submitted,

/s/ David S. Steingold

LAW OFFICES OF DAVID S. STEINGOLD

BY: DAVID S. STEINGOLD (P 29752)

Counsel for Defendant

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CERTIFICATE OF SERVICE

David S. Steingold (P29752) hereby certifies that on February 22, 2017, I electronically filed the above-annexed pleading with the United States District Court for the Eastern District of Michigan using the ECF/CM electronic filing system which will automatically send electronic notification of this filing to all attorneys of record for all parties.

Respectfully submitted,

/s/ David S. Steingold

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